



## T. A. BLACKBURN LAW

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March 23, 2024

United States District Judge Denise L. Cote  
Southern District Of New York  
500 Pearl Street, Courtroom 18B  
New York, New York 10007

**Re: Zunzurovski v. Fisher et al.; 1:23-cv-10881-DLC**

Dear Judge Cote,

I respectfully submit this letter to supplement the letter I filed on March 21, 2024, which was a response to the letter submitted by the Defendant's Counsel dated March 21, 2024. To illustrate just how demonstrably false Defendant counsel's assertion that Plaintiff lived in the "adjacent town" from Defendant Fisher, please see the map embedded below. Glen Ridge, New Jersey, is in Essex County, while Tenaflly, New Jersey, is in Bergen County. Secondly, at least eight towns separate Tenaflly and Glen Ridge. As evidenced by the map below, driving from Tenaflly to Glen Ridge will take at least 40 minutes.

I am writing this letter to illustrate the fact that people make mistakes. Do I think the Defendant's counsel tried to intentionally deceive the Court by making a demonstrably false claim on the record during the March 5, 2024, hearing and then doubling down on it in a letter dated March 21, 2024 – no, I do not. It is evident that she did not do her "due diligence" to ensure that the representation she made before the Court on two occasions was correct. While an attorney may generally rely on client representations, an attorney may not accept these representations at face value. *In re Seare*, 493 B.R. at 211. Rather, an attorney must independently verify publicly available facts to determine whether such representations are objectively reasonable and to inquire further if the attorney is unable to verify such facts. *In re Parikh*, 508 B.R. at 585-86. *In re Hanson*, No. 8-13-73855-las, 2015 Bankr. LEXIS 607, at \*16 (Bankr. E.D.N.Y. February 27, 2015).

Defendants Counsel is only human, and so am I. We will make mistakes.



347-342-7432



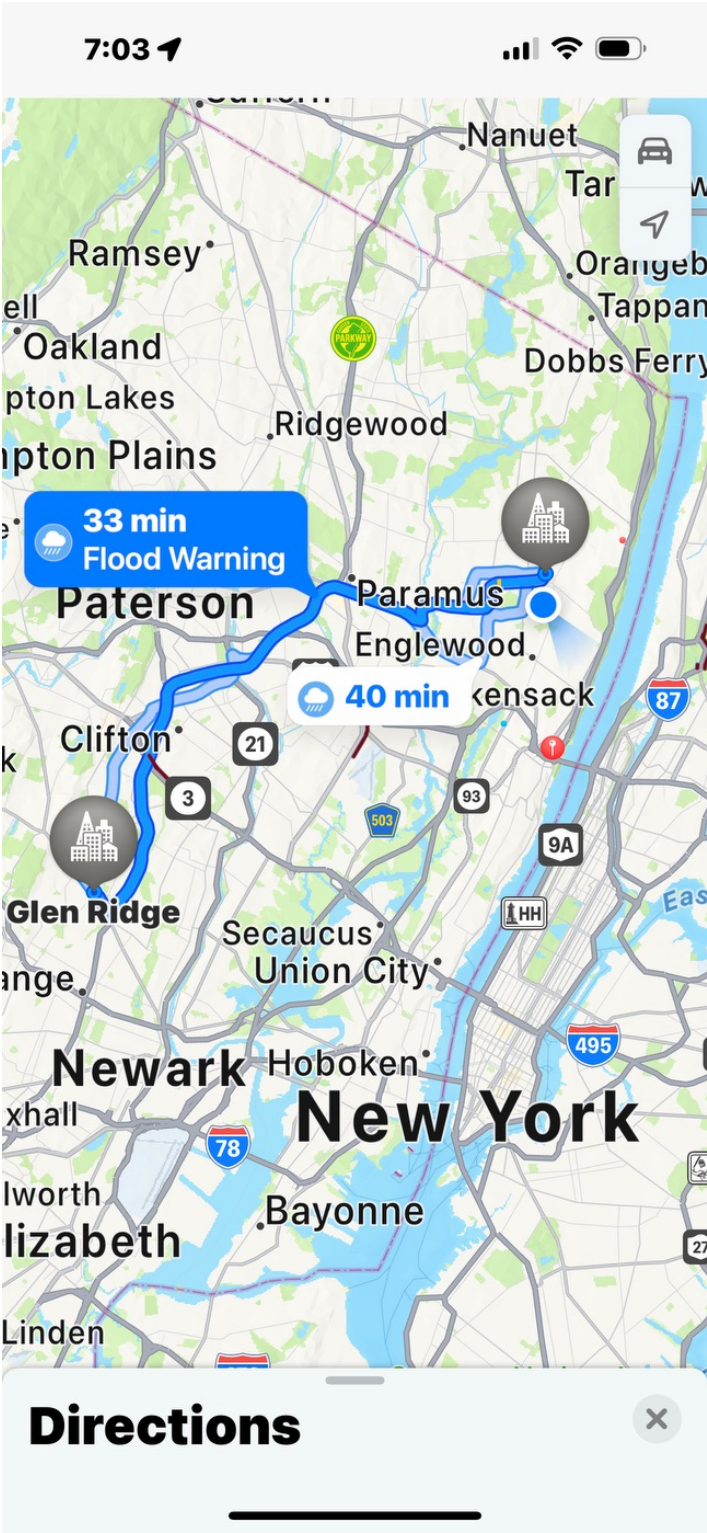
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In the end, I respectfully ask that the Court be fair and balanced. If Your Honor is inclined to sanction me for committing an error as it relates to Defendant Fisher's domicile, even though I provided the Court with the steps I took to ensure that I was correct concerning Defendant Fisher's domicile before filing, then I ask that the Court be fair and balanced and sanction Defendants Counsel for failing to do her due diligence before presenting demonstrably false information to the Court during the March 5, 2024 hearing, and in her March 21, 2024 letter to the Court where she doubled down on the claim that my client lived in the town adjacent to Defendant Fisher. The same goes for the claim Defendant Counsel made concerning Defendant Fisher's kids and Plaintiff's kids playing on the same sports team (claim made on the record during the March 5, 2024, hearing) or playing on rival sports teams (new claim in the March 21, 2024, letter), and contradictory statements she made on the record concerning Plaintiff and Defendant Fisher, as well as the selection of a Jams mediator.

Respectfully submitted,

*Tyrone Blackburn, Esq.*  
Tyrone A. Blackburn, Esq.

Cc: counsel of record via ECF.